

**Mr. Rasik H Raval
Limited Corporation
4133 New Haven Avenue
Fort Wayne, IN 46803**

Re: Exempt Operation Status,
003-12843-00034

Dear Mr.Rasik Raval:

The application from Limited Corporation, received on October 17, 2000, has been reviewed. Based on data submitted and provisions in 326 IAC 2-1.1-3, it has been determined that the different kinds of oil storage establishment, to be located at 4133 New Haven Avenue, Fort Wayne, Indiana, is classified as exempt from air pollution permit requirements. The source has the following Permitted Emission Units:

- (a) Five (5) vertical fixed roof cone storage tanks with the following numbering and capacities; # 20- 194,322 gallons, # 21- 194,322 gallons, #42- 259,096 gallons, # 43- 259,078 gallons, and #51- 259,078 gallons.
- (b) One (1) vertical internal floating roof storage tank # 39 with a storage capacity of 523,174 gallons.

The following conditions shall be applicable:

- (1) Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:
 - (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.
- (2) For storage tank # 39:

Subpart K, 40 CFR 60.112 (326 IAC 12), the storage tank shall be equipped with a floating roof, a vapor recovery system, or their equivalents.

Pursuant to 40 CFR 60.113 (326 IAC 12), the owner or operator shall maintain a record of the

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petroleum liquid stored, the period of storage and the maximum true vapor pressure of that liquid during the respective storage period.

Pursuant to 326 IAC 8-4-3(b), the facility is maintained such that there are no visible holes, or other openings in the seal or any seal fabric or materials.

Pursuant to 326 IAC 8-4-3(c), all openings, except stub drains, are equipped with covers, lids, or seals such that:

- (a) the cover, lid, or seal is in the closed position at all times except when in actual use.
- (b) automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supports.
- (c) rim vents, if provided, are set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended settings.

Pursuant to 326 IAC 8-4-3(d), owners or operators of petroleum liquid storage vessels shall maintain records of the types of volatile petroleum liquid stored, the maximum true vapor pressure of the liquid as stored, and the results of the inspections performed on the storage vessels. Such records shall be maintained for a period of two (2) years and shall be made available to the commissioner upon written request.

This source was previously registered. Due to the rule change in exemption emission levels, the source is now an exempt source.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

MZK

cc: File - Allen County
Allen County Health Department
Air Compliance - Ryan Hillman
Permit Tracking - Janet Mobley
Technical Support and Modeling - Michele Boner
Compliance Data Section - Karen Nowak

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for an **Exemption**

Source Name: Limited Corporation
Source Location: 4133 New Haven Avenue, Fort Wayne, IN 46803
County: Allen
SIC Code: 5171
Operation Permit No: 003-12843-00034
Permit Reviewer: Mohammad Khan

The Office of Air Quality (OAQ) has reviewed an application from Limited Corporation involved with the storage of different kinds of oils in different storage tanks.

Permitted Emission Units and Pollution Control Equipment:

- (a) 5 (five) vertical fixed roof cone storage tanks with the following numbering and capacities; # 20 - 194, 322 gallons, #21 - 194,322 gallons, #42 - 259,096 gallons, #43 - 259,078 gallons, and #51 - 259,078 gallons.
- (b) 1 (one) vertical internal floating roof storage tank # 39 with a storage capacity of 523, 174 gallons.

Existing Approvals

The source was previously registered, but the source has no existing approvals for the applied storage tanks # 20, 21, 39, 42, 43 and 51.

Enforcement Issue

There are no enforcement actions pending.

Storage Tank's Summary

Storage Tank's ID	Vertical Height (feet)	Diameter (feet)	Max. Liquid Height (feet)	Annual throughput (Gal/yr)	Tank Volumes (gal)
20 (Vertical) # 2 oil	30	35	27	500,000	194,322
21 (Vertical) Used oil	30	35	27	4,000,000	194,322
39 (Vertical) Int. Float Roof Recovery oil	48	45	44	500,000	523,174
42 (Vertical) # 4 oil	40	35	36	500,000	259,096
43 (Vertical) # 4 oil	40	35	36	500,000	259,078

51 (Vertical) # 4 oil	40	35	36	500,000	259,078
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Note:

2 oil designated as Distillate fuel oil # 2

4 oil is a mixture of 50% # 2 oil and 50% Decanted oil (# 6 oil).

Stack Summary

There are no stacks associated with the proposed storage tanks

Recommendation

The staff recommends to the Commissioner that the operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on December 19, 2000.

Emission Calculations

See Appendix A of this Technical Support Document for detailed emissions calculations.

Tank Emissions

Tank ID	Liquid Stored	Emissions lb/yr	Emissions Tons/yr
20	Distillate fuel oil # 2	16.35	0.0081
21	Used oil	69.24	0.034
39	Jet naphtha (JP-4)	603.88	0.301
42	Residual oil # 6 and Distillate fuel oil # 2	10.58	0.0052
43	Residual oil # 6 and Distillate fuel oil # 2	11.05	0.0055
51	Residual oil # 6 and Distillate fuel oil # 2	11.05	0.0055
Total			0.3593

Potential To Emit of Source Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is

enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	0.0
SO ₂	0.0
VOC	0.4
CO	0.0
NO _x	0.0

HAP	Potential to Emit (tons/year)
Various HAPs	Negligible
Total	Negligible

The potential to emit of all criteria pollutants are less than the levels specified in 326 IAC 2-1.1-3 (d) (1). Therefore, an exemption will be issued to the source.

County Attainment Status

The source is located in Allen County, Fort Wayne.

Pollutant	Status (attainment, maintenance attainment, or unclassifiable; severe, moderate, or marginal nonattainment)
PM	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Allen County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Allen County has been classified as attainment or unclassifiable for PM, SO₂, NO_x, and CO. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, 40 CFR 52.21 or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and emission offset applicability.

Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	0.0
SO ₂	0.0
VOC	0.4
CO	0.0
NOx	0.0
Combination of HAP	Negligible

This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more and it is not in one of the 28 listed source categories.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

This status is based on all the air approvals issued to the source. This status has been verified by the OAQ inspector assigned to the source.

Federal Rule Applicability

- (a) Subpart K, Ka and Kb do not apply to storage tanks 20, 21, 42, 43 and 51, because their construction predates these rules. The tanks were constructed in 1960.
- (b) Subpart K (Standards of performance for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification Commenced after June 11, 1973, and Prior to May 19, 1978, rule through 40 CFR 60.110 to 40 CFR 60.113) applies to floating roof storage tank 39. This tank was constructed in the year 1975, and it has a capacity greater than 40,000 gallons. As per rule of 40 CFR 60.112 this storage tank is equipped with a floating roof.
- (c) Pursuant to 40 CFR 60.113, the source is required to keep the records of petroleum liquid stored, the period of storage, and the maximum true vapor pressure of that liquid during the respective storage period.
- (d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is in Allen County and its potential to emit VOC is less than 100 tons per year. Therefore, the rule 2-6 does not apply.

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of the storage tanks will emit HAPs less than 10 tons per year for a single HAP and less than 25 tons per year for a combination of HAPs. Therefore, rule 2-4.1 does not apply.

326 IAC 8-4 (Petroleum Sources)

Sections 2 through 5 and 7 through 9 of this rule apply to new sources after January 1, 1980.

This source has an operation permit dated May 1979. Therefore, the source would predate this rule and the rule does not apply. However, when a registration was issued in February 1999, the source was determined to be a new source. This determination was due to the source being shutdown for some time and then restarted.

Therefore, Section 3 for petroleum liquid storage facilities would apply to a storage vessel with a capacity of greater than 39,000 gallons and material with a true vapor pressure of greater than 1.52 psi. Only tank 39 meets these requirements. All other tanks store material with a vapor pressure less than 1.52 psi. Tank 39 must meet the requirements of 8-4-3(c)(2) and (d).

Conclusion

The operation of the storage tanks shall be subject to the conditions of the attached proposed Exemption **003-12843-00034**.